

November 13, 2019

VIA ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1106
New York, NY 10007

Re: Wisser v. Vox Media, Inc., 1:19-cv-01445 (LGS)

Dear Judge Schofield:

We represent Plaintiff Bill Wisser (“Plaintiff”) in the above-captioned case and write pursuant to section III.B.5 of Your Honor’s Individual Practice Rules.

Pursuant to the Court’s order, on November 12, 2019, Plaintiff re-filed amended opposition papers to Defendant’s Vox Media, Inc.’s motion for sanctions, which consists of an amended memorandum of law¹ [Dkt. #54], revised Declaration of Richard Liebowitz plus exhibits [Dkt. #55]; and Declaration of Bill Wisser² plus revised exhibits A, B and D (Exhibit C was intentionally omitted) [Dkt. #56]. The Declaration of James Freeman [Dkt. #48] was not amended and therefore not re-filed. The new submission complies with Section III.B.3 of Your Honor’s Individual Rules.

In light of Plaintiff’s re-filing of his amended opposition papers, Plaintiff respectfully requests leave of Court to deliver another courtesy copy of all parties’ motion papers, organized in a three-ring binder in the following order:

- 1) Plaintiff’s Notice of Motion, Memorandum of Law, Declaration of Rachel Strom plus exhibits.
- 2) Defendant’s Opposition Memorandum (as amended), Declaration of Bill Wisser plus exhibits (as amended), Declaration of Richard Liebowitz plus exhibits (as amended); Declaration of James Freeman.

¹ Please note that Plaintiff did not make any substantive changes to the original memorandum but only updated citations to the revised declaration of Richard Liebowitz.

² The Wisser Declaration is identical to that filed on October 24, 2019.

3) Plaintiff's Reply Memorandum of Law, Reply Declaration of Rachel Strom, plus exhibits.

Thank you for Your Honor's consideration.

Respectfully Submitted,

/s/richardliebowitz/
Richard Liebowitz

Counsel for Plaintiff Bill Wisser